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11 Attorneys for Plaintiff Taylor Kalin, the Classes
12 and Aggrieved Employees

13
14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 Taylor Kalin, individually and on behalf of
18 all the classes and aggrieved employees,

19 Plaintiff,

20 vs.

21 Apple, Inc.,

22 Defendant.

23 Case No. 13-CV-04727-WHA

24 Plaintiff Taylor Kalin's Response to
Defendant Apple, Inc.'s Requests for
Production of Documents

25 EXHIBIT 8
WIT: Kalin
DATE: 3-18-14
Shelley M. Sailor, CSR 10254

26 **Request for Production No. 1:** Any and all DOCUMENTS that relate to, refer to, or
show communications, oral or written, between you and Apple regarding the allegations
27 of the COMPLAINT, including, but not limited to, policies, training materials, time
records, journals, notes, complaints, receipts, work schedules, email communications,
28

Plaintiff Taylor Kalin's Response to Defendant Apple, Inc.'s Requests for
Production of Documents

1 text messages, voicemails, letters, telephone scripts, and correspondence from online
2 forums and/or social networking websites.

3 **Response:** Objection. This request seeks documents protected by the attorney-client
4 privilege. Without waiving said objection, responding party has so far been unable to
5 locate any non-privileged responsive documents.

6 **Request for Production No. 2:** Any and all DOCUMENTS that relate to, refer to or
7 show communications, oral or written, between any other Apple employee and Apple
8 regarding the allegations of the COMPLAINT, including, but not limited to, policies,
9 training materials, time records, journals, notes, complaints, receipts, work schedules,
correspondence from online forums and/or social networking websites.

10 **Response:** Objection. This request seeks documents protected by the attorney-client
11 privilege. Without waiving said objection, responding party has so far been unable to
12 locate any non-privileged responsive documents.

13 **Request for Production No. 3:** Any and all communications or correspondence between
14 any current or former Apple employee (including you) and any Apple supervisor relating
15 or referring to the allegations of the COMPLAINT, including email communications, text
16 messages, voicemails, letters, telephone scripts, and correspondence from online forums
and/or social networking websites.

17 **Response:** Objection. This request seeks documents protected by the attorney-client
18 privilege. Without waiving said objection, responding party has so far been unable to
19 locate any non-privileged responsive documents.

20 **Request for Production No. 4:** Any and all DOCUMENTS that relate to, refer to or
show communications, oral or written, between you and any other named or opt-in
21 plaintiff in this action, including email communications, text messages, voicemails,
letters, telephone scripts, and correspondence from online forums and/or social
networking websites.

22 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
23 locate any non-privileged responsive documents.

24 **Request for Production No. 5:** Any and all communications or correspondence you or
25 your counsel have had with any person (including but not limited to current and/or former
employees of Apple) relating or referring to the claims alleged in the COMPLAINT,

1 including email communications, text messages, voicemails, letters, telephone scripts,
2 and correspondence from online forums and/or social networking websites.

3 **Response:** Objection. This request seeks documents protected by the attorney-client
4 privilege. Without waiving said objection, responding party has so far been unable to
5 locate any non-privileged responsive documents.

6 **Request for Production No. 6:** Any and all DOCUMENTS that show what days and
7 times you actually worked while employed by Apple during the period from October 10,
8 2009 to the present, including but not limited to time records.

9 **Response:** Objection. This request seeks documents protected by the attorney-client
10 privilege. Without waiving said objection, responding party has so far been unable to
11 locate any non-privileged responsive documents.

12 **Request for Production No. 7:** Any and all DOCUMENTS that show what days and
13 times you were scheduled to work at Apple during the period from October 10, 2009
14 through your separation, including but not limited to work schedules.

15 **Response:** Objection. This request seeks documents protected by the attorney-client
16 privilege. Without waiving said objection, responding party has so far been unable to
17 locate any non-privileged responsive documents.

18 **Request for Production No. 8:** Any and all DOCUMENTS that relate to your work
19 assignments, job duties and responsibilities, as well as any changes to the same, during
20 your employment with Apple, including, but not limited to, any and all job or
21 performance evaluations and training materials.

22 **Response:** Objection. This request seeks documents protected by the attorney-client
23 privilege. Without waiving said objection, responding party has so far been unable to
24 locate any non-privileged responsive documents.

25 **Request for Production No. 9:** Any and all DOCUMENTS that reflect or relate to
26 evaluations of your performance at Apple.

27 **Response:** Objection. This request seeks documents protected by the attorney-client
28 privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.

1 **Request for Production No. 10:** Any and all DOCUMENTS that reflect or relate to
2 discipline you received, including but not limited to any warning or counseling, during
your employment with Apple.

3
4 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.

5
6 **Request for Production No. 11:** Any and all DOCUMENTS that reflect or relate to
criticisms or negative comments about your work performance that you received from
Apple during your employment with Apple.

7
8 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.

9
10 **Request for Production No. 12:** Any and all DOCUMENTS that reflect or relate to
commendations, awards or positive comments about your work performance that you
received from Apple during your employment with Apple.

11
12 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.

13
14 **Request for Production No. 13:** Any and all DOCUMENTS that relate to and/or reflect
compensation you received from Apple from October 10, 2009 to the present, including
but not limited to wage statements, paychecks or paycheck stubs, and direct deposit slips.

15
16 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.

17
18 **Request for Production No. 14:** Any and all DOCUMENTS that relate to, reflect and/or
constitute any diaries, journals, summaries, appointment books, client books,
memoranda, day planners, or calendar entries of any kind, that refer to your employment
with Apple.

19
20 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.

1 **Request for Production No. 15:** Any and all DOCUMENTS that refer, relate and/or
2 pertain to, or otherwise evidence or memorialize any complaints you made to any
3 employee or agent of Apple about your employment, including but not limited to
4 complaints about personal package and bag searches, technology checks or payment of
wages.

5 **Response:** Objection. This request seeks documents protected by the attorney-client
6 privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.
7

8 **Request for Production No. 16:** Any and all DOCUMENTS that constitute, relate to
9 and/or substantiate any charges or complaints you filed with any federal, state, or local
10 governmental agencies or entities, including but not limited to, the U.S. Department of
Labor, the Equal Employment Opportunity Commission, and/or the Division of Labor
Standards Enforcement or California Labor Commissioner regarding Apple or any of
11 Apple's employees or agents.

12 **Response:** Objection. This request seeks documents protected by the attorney-client
13 privilege. Without waiving said objection, responding party has so far been unable to
14 locate any non-privileged responsive documents.
15

16 **Request for Production No. 17:** Any and all DOCUMENTS that relate to, refer to or
show any and all criminal proceedings brought against you at any time.
17

18 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.
19

20 **Request for Production No. 18:** Any and all DOCUMENTS that relate to, refer to or
show any and all civil lawsuits or other actions brought by or against you within the last
21 ten (10) years, including, but not limited to, any bankruptcies or other civil actions.
22

23 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.
24

25 **Request for Production No. 19:** Any and all DOCUMENTS that relate to, refer to or
show any and all civil administrative proceedings brought by or against you within the
last ten (10) years, including, without limitation, claims for disability benefits, workers'
compensation benefits, and/or unemployment benefits.
26

1 **Response:** Objection. This request seeks documents protected by the attorney-client
2 privilege. Without waiving said objection, responding party has so far been unable to
3 locate any non-privileged responsive documents.

4 **Request for Production No. 20:** Any and all DOCUMENTS regarding or related to
5 recording your work time at Apple including but not limited to, policies about recording
6 all hours worked, reminders about recording all hours worked, and instructions on how to
7 record your time.

8 **Response:** Objection. This request seeks documents protected by the attorney-client
9 privilege. Without waiving said objection, responding party has so far been unable to
10 locate any non-privileged responsive documents.

11 **Request for Production No. 21:** Any and all DOCUMENTS that show, contain and/or
12 reference the dates and times on which you contend you worked time that was not
13 recorded due to you having undergone or waited for a personal package and bag search
14 during your employment with Apple.

15 **Response:** Objection. This request seeks documents protected by the attorney-client
16 privilege. Without waiving said objection, responding party has so far been unable to
17 locate any non-privileged responsive documents.

18 **Request for Production No. 22:** Any and all DOCUMENTS that show, contain and/or
19 reference the dates and times during your employment with Apple on which you contend
20 that Apple failed to pay you correctly for all hours worked due to you having undergone
21 or waited for a personal package and bag search.

22 **Response:** Objection. This request seeks documents protected by the attorney-client
23 privilege. Without waiving said objection, responding party has so far been unable to
24 locate any non-privileged responsive documents.

25 **Request for Production No. 23:** Any and all DOCUMENTS that show, contain and/or
26 reference calculations of the amount of unpaid wages that you believe that Apple owes
27 you due to you having undergone or waited for a personal package and bag search.

28 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.

1 **Request for Production No. 24:** Any and all DOCUMENTS that refer to, support or
2 substantiate your second claim for Violations of the Fair Labor Standards Act as alleged
3 in the COMPLAINT.

4 **Response:** Objection. This request seeks documents protected by the attorney-client
5 privilege. Without waiving said objection, responding party has so far been unable to
6 locate any non-privileged responsive documents.

7 **Request for Production No. 25:** Print-outs, screen shots or other DOCUMENTS from
8 any internet website, online forum, blog or social networking site (including but not
9 limited to Twitter, Face book, YouTube, MySpace, LinkedIn or Google+) to which or
10 through which you or your counsel have posted any information or communicated
11 regarding or referencing your employment with Apple and/or any information related to
12 any of the claims in the COMPLAINT.

13 **Response:** Objection. This request seeks documents protected by the attorney-client
14 privilege. Without waiving said objection, responding party has so far been unable to
15 locate any non-privileged responsive documents.

16 **Request for Production No. 26:** Any and all non-privileged DOCUMENTS that
17 constitute and/or reflect statements you and/or others acting on your behalf obtained at
18 any point that reference the claims at issue in the COMPLAINT, including but not
19 limited to declarations, affidavits, completed surveys, completed questionnaires and/or
20 other written statements.

21 **Response:** Objection. This request seeks documents protected by the attorney-client
22 privilege. Without waiving said objection, responding party has so far been unable to
23 locate any non-privileged responsive documents.

24 **Request for Production No. 27:** Any and all photos or audio or video recordings of
25 Apple employees at work or on Apple premises, made by or on your behalf at any time.

26 **Response:** Objection. This request seeks documents protected by the attorney-client
27 privilege. Without waiving said objection, responding party has so far been unable to
28 locate any non-privileged responsive documents.

29 **Request for Production No. 28:** Any and all photos or audio or video recordings of any
30 Apple store or other Apple premises, made by or on your behalf at any time.

1 **Response:** Objection. This request seeks documents protected by the attorney-client
2 privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents.

3
4 **Request for Production No. 29:** Any and all DOCUMENTS that relate to and/or
substantiate the contention that Plaintiff was required to arrive prior to his shift and wait
5 to clock in, as alleged in paragraph 13 of the COMPLAINT.

6
7 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
8 locate any non-privileged responsive documents other than those produced by Apple or
by other plaintiffs in the related litigation.

9
10 **Request for Production No. 30:** Any and all DOCUMENTS that relate to and/or
substantiate the contention that “the check-in time [took] anywhere from five to 45
11 minutes or more,” as alleged in paragraph 15 of the COMPLAINT.

12
13 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
14 locate any non-privileged responsive documents other than those produced by Apple or
by other plaintiffs in the related litigation.

15
16 **Request for Production No. 31:** Any and all DOCUMENTS that relate to and/or
substantiate the contention that “Kalin and other Hourly Employees were required to
17 undergo personal package and bag searches before they were permitted to leave the
store,” as alleged in paragraph 16 of the COMPLAINT.

18
19 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
20 locate any non-privileged responsive documents other than those produced by Apple or
21 by other plaintiffs in the related litigation.

22
23 **Request for Production No. 32:** Any and all DOCUMENTS that relate to and/or
substantiate the contention that “Plaintiff and other Hourly Employees were and are
24 required to wait in line for security checks for at least 10-15 minutes each day before
leaving for their meal breaks and at the end of their shift after they had already clocked
25 out,” as alleged in paragraph 17 of the COMPLAINT.

26
27 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to

1 locate any non-privileged responsive documents other than those produced by Apple or
2 by other plaintiffs in the related litigation.

3 **Request for Production No. 33:** Any and all DOCUMENTS that relate to and/or
4 substantiate the contention that "Hourly Employees are forced to wait in these lines and
5 undergo lengthy off-the-clock security screenings before they are allowed to leave the
premises," as alleged in paragraph 18 of the COMPLAINT.

6 **Response:** Objection. This request seeks documents protected by the attorney-client
7 privilege. Without waiving said objection, responding party has so far been unable to
8 locate any non-privileged responsive documents other than those produced by Apple or
by other plaintiffs in the related litigation.
9

10 **Request for Production No. 34:** Any and all DOCUMENTS that relate to and/or
11 substantiate the contention that "[w]aiting in lines to clock in, waiting in lines to check
12 equipment in, and waiting in line and undergoing security checks were significant,
integral, indispensable, not de minimis tasks or requests," as alleged in paragraph 21 of
the COMPLAINT.
13

14 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents other than those produced by Apple or
by other plaintiffs in the related litigation.
15

16 **Request for Production No. 35:** Any and all DOCUMENTS that relate to and/or
17 substantiate the contention that members of the FLSA Collective Class, as defined in
18 paragraph 27 of the COMPLAINT, are similarly situated within the meaning of 29
U.S.C. 216(b).
19

20 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
locate any non-privileged responsive documents other than those produced by Apple or
by other plaintiffs in the related litigation.
21

22 **Request for Production No. 36:** Any and all DOCUMENTS that relate to and/or
23 substantiate the contention that Plaintiff is an "aggrieved employee" within the meaning
of California Labor Code section 2699(c), as alleged in paragraph 65 of the
COMPLAINT.
24

25 **Response:** Objection. This request seeks documents protected by the attorney-client
privilege. Without waiving said objection, responding party has so far been unable to
26

1 locate any non-privileged responsive documents other than those produced by Apple or
2 by other plaintiffs in the related litigation.

3 **Request for Production No. 37:** Any and all DOCUMENTS you have taken or removed
4 from Apple's premises that refer to personal package and bag searches of employees or
5 that otherwise relate in any way to the allegations in the COMPLAINT.

6 **Response:** Objection. This request seeks documents protected by the attorney-client
7 privilege. Without waiving said objection, responding party has so far been unable to
8 locate any non-privileged responsive documents.

9 **Request for Production No. 38:** Any and all DOCUMENTS you have downloaded,
10 copied, or otherwise obtained from Apple's computer systems that refer to personal
11 package and bag searches of employees or that otherwise relate in any way to the
12 allegations of the COMPLAINT.

13 **Response:** Objection. This request seeks documents protected by the attorney-client
14 privilege. Without waiving said objection, responding party has so far been unable to
15 locate any non-privileged responsive documents.

Dated: March 11, 2014

THE DION-KINDEM LAW FIRM



18 BY: _____
19 PETER R. DION-KINDEM, P.C.
20 PETER R. DION-KINDEM
21 Attorneys for Plaintiff Taylor Kalin
22
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Verification

I have reviewed the foregoing Plaintiff's Responses to Defendant Apple, Inc.'s Requests for Production of Documents. They are true and correct to the best of my recollection, knowledge and belief. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated:

3/11/14

Taylor Kalin

Taylor Hartin

1 PROOF OF SERVICE
2

3 I, Eric Padilla, declare:

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not
5 a party to the within action. My business address is 3311 East Pico Boulevard, Los Angeles, CA 90023.

6 On March 11, 2014 I served the forgoing documents described as: PLAINTIFF TAYLOR
7 KALIN'S OBJECTIONS AND RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS,
8 on the interested parties in this action by placing the original thereof enclosed in a sealed envelope
9 addressed as follows:

10 JULIE A. DUNNE, Esq.
11 LARA K. STRAUSS, Esq.
12 LITTLER MENDELSON, P.C.
13 501 W. Broadway, Suite 900
14 San Diego, California 92101.3577

15 JOSHUA D. KIENITZ, Esq.
16 LITTLER MENDELSON, P.C.
17 650 California Street, 20th Floor
18 San Francisco, California 94108-2693

19 TODD K. BOYER, Esq.
20 KARIN M. COGBILL, Esq.
21 NICOLAS T. KELSEY, Esq.
22 LITTLER MENDELSON, P.C.
23 50 W. San Fernando St., 15th Floor
24 San Jose, CA 95113.2303

25 [x] (BY MAIL) I am "readily familiar" with the firm's practice of collection and processing
correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on
that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of
business.

26 [] (BY FAX) I faxed the documents to the persons at the fax numbers listed above. No error was
27 reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed
out, is attached.

28 [] (BY PERSONAL DELIVERY) I caused such envelope to be delivered by hand to the offices of
the addressee.

[x] (STATE) I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

[] (FEDERAL) I declare that I am employed in the offices of a member of this Court at whose
direction the service was made.

EXECUTED on March 11, 2014, Los Angeles, California.

Erie Padilla

1 LONNIE C. BLANCHARD, III (SBN 93530)
2 JEFFREY D. HOLMES (SBN 100891)
3 THE BLANCHARD LAW GROUP, APC
4 3311 East Pico Boulevard
5 Los Angeles, CA 90023
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Fax: (818) 883-4902
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11 Attorneys for Plaintiff Taylor Kalin, the Classes
12 and Aggrieved Employees

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 Taylor Kalin, individually and on behalf of
18 all the classes and aggrieved employees,

19 Plaintiff,

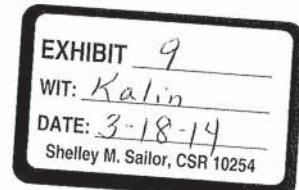
20 vs.

22 Apple, Inc.,

24 Defendant.

Case No. 13-CV-04727-WHA

Plaintiff Taylor Kalin's Response to
Defendant Apple, Inc.'s
Interrogatories



25 **Interrogatory No. 1:** Identify each and every Apple technology and/or device that you
26 owned, had in your control and/or had listed on an Apple technology card at any point
27 from October 10, 2009 to the present, by listing the model name and model number,
IMEI, serial number, and dates of ownership and/or regular use.

28 **Plaintiff Taylor Kalin's Response to Defendant Apple, Inc.'s Interrogatories**

Response: Objection. This is compound and not complete in and of itself. Without waiving said objection, I do not still own any technology that was on my technology card. Thus I don't have any details for the devices anymore and have no way to find them.

Interrogatory No. 2: For each and every technology and/or device listed in response to Interrogatory No. 1 that is no longer in your possession or that you no longer use regularly, state the date(s) the technology and/or device ceased to be in your possession and/or when you stopped using it regularly, and explain in detail why it is no longer in your possession (e.g., it was sold, lost, discarded, etc.) and/or why you stopped using it regularly.

Response: Objection. This is compound and not complete in and of itself. This is also irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objection, I do not still own any technology that was on my technology card.

Dated: March 11, 2014

THE DION-KINDEM LAW FIRM

Peter von Lindern

By:

PETER R. DION-KINDEM, P.C.
PETER R. DION-KINDEM
Attorneys for Plaintiff Taylor Kalin

Verification

I have reviewed the foregoing Plaintiff's Responses to Defendant Apple, Inc.'s Interrogatories. They are true and correct to the best of my recollection, knowledge and belief. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated:

Dated: 3/11/14

Taylor Kalin

Taylor / Kalin

PROOF OF SERVICE

I, Eric Padilla, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 3311 East Pico Boulevard, Los Angeles, CA 90023.

On March 11, 2014 I served the forgoing documents described as: **PLAINTIFF TAYLOR KALIN'S OBJECTIONS AND RESPONSES TO DEFENDANTS INTERROGATORIES**, on the interested parties in this action by placing the original thereof enclosed in a sealed envelope addressed as follows:

JULIE A. DUNNE, Esq.
LARA K. STRAUSS, Esq.
LITTLER MENDELSON, P.C.
501 W. Broadway, Suite 900
San Diego, California 92101-3577

JOSHUA D. KIENITZ, Esq.
LITTLER MENDELSON, P.C.
650 California Street, 20th Floor
San Francisco, California 94108-2693

TODD K. BOYER, Esq.
KARIN M. COGBILL, Esq.
NICOLAS T. KELSEY, Esq.
LITTLER MENDELSON, P.C.
50 W. San Fernando St., 15th Floor
San Jose, CA 95113-2303

[x] (BY MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.

[] (BY FAX) I faxed the documents to the persons at the fax numbers listed above. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.

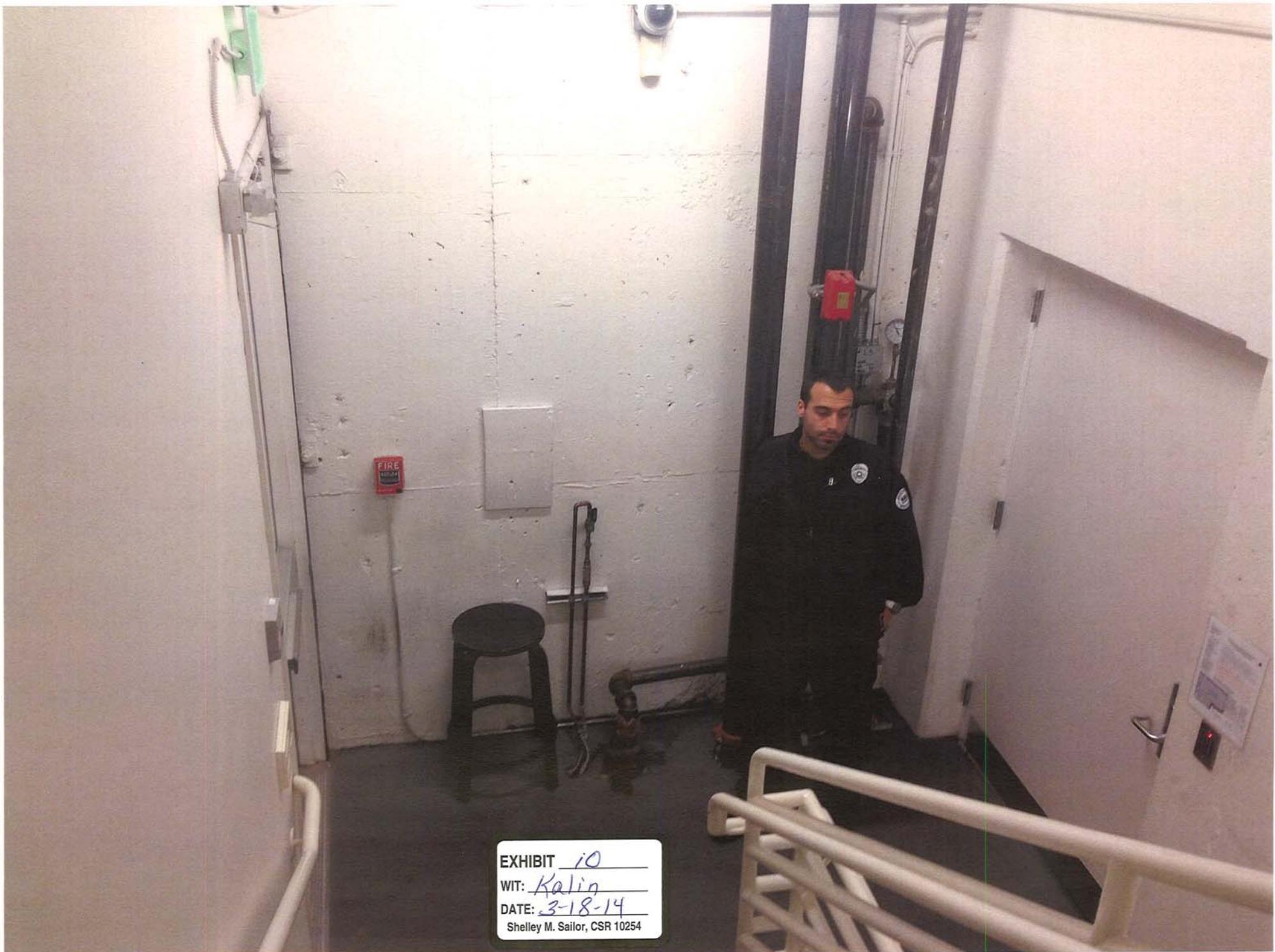
[] (BY PERSONAL DELIVERY) I caused such envelope to be delivered by hand to the offices of the addressee.

[x] (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

[] (FEDERAL) I declare that I am employed in the offices of a member of this Court at whose direction the service was made.

EXECUTED on March 11, 2014, Los Angeles, California

Eric Padilla



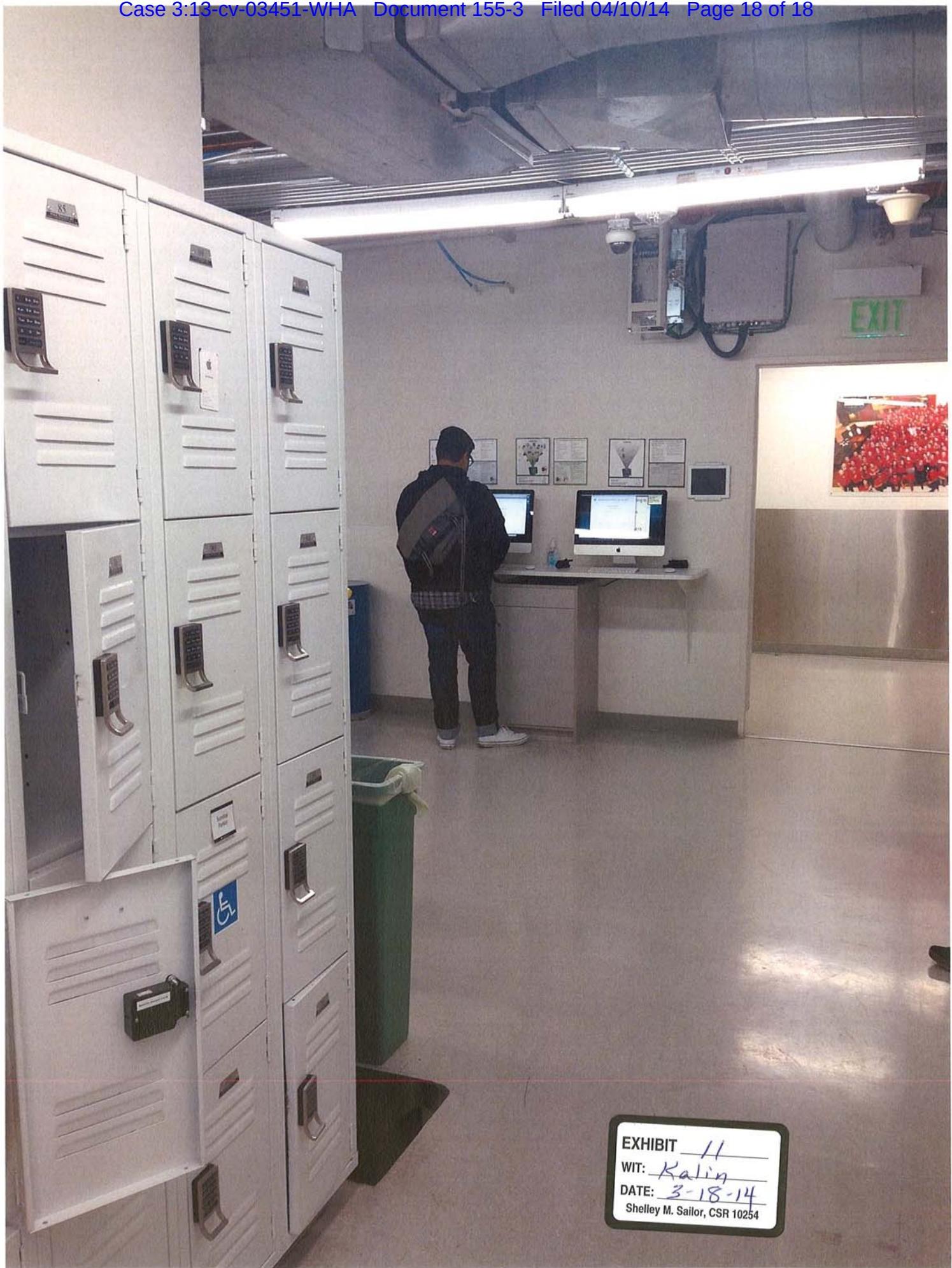


EXHIBIT 11
WIT: Kalin
DATE: 3-18-14
Shelley M. Sailor, CSR 10254